

**FILED**  
**11/21/2025**  
 THOMAS G. BRUTON  
 CLERK, U.S. DISTRICT COURT  
 AXM

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF ILLINOIS  
 EASTERN DIVISION**

NEALY L. SKELDON,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:25-cv-06078
v.	)	
	)	District Judge Joan B. Gottschall
DERMACARE USA Corporation d/b/a	)	
DERMACONCEPTS, Robert Lewis Trow,	)	Magistrate Judge Jeffrey T. Gilbert
Carol Smira Trow, Michael Lucich, and	)	
Brittany Pike	)	
Defendants.		

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO OBTAIN COUNSEL**

Plaintiff Nealy Skeldon ("Plaintiff"), proceeding *pro se*, respectfully moves this Court for a forty-five (45) day extension of time, from the current deadline of November 24, 2025, to obtain new counsel and have them file an appearance in this matter. In support of this motion, Plaintiff states as follows:

**INTRODUCTION**

1. On October 24, 2025, this Court granted the motion to withdraw filed by Plaintiff's former counsel and stayed this matter for thirty (30) days, ordering Plaintiff to retain new counsel by November 24, 2025.
2. Plaintiff has been working diligently to find and retain new counsel but has not yet been successful.
3. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Plaintiff now requests a reasonable extension of time to continue her search and secure representation to ensure this case may be prosecuted effectively.

**ARGUMENT**

Good cause exists to grant the requested extension.

Federal Rule of Civil Procedure 6(b)(1)(A) permits the Court to extend a deadline for "good cause" when the request is made before the original time expires. Here, good cause exists for the following reasons:

1. Diligent Search for Counsel: Since her prior counsel's withdrawal, Plaintiff has been engaged in a continuous and diligent search for new legal representation. This search has

involved researching and identifying law firms with relevant experience in employment and contract law.

2. Complexity of the Case: This matter involves complex claims requiring specialized legal expertise, including breach of an employment contract, violations of the Illinois Wage Payment and Collection Act (IWPCA), a request for declaratory judgment concerning a non-competition agreement, and a violation of the Illinois Right of Publicity Act. The specialized nature of these claims has made the search for suitable counsel more challenging and time-consuming.

3. Active Engagement with Law Firms: Plaintiff has contacted multiple law firms to discuss her case. She is actively engaged in the process of consulting with and interviewing potential attorneys to find counsel equipped to handle the specific legal issues presented in her First Amended Complaint.

4. Need for Additional Time: Despite these diligent and ongoing efforts, Plaintiff has not yet been able to formally retain new counsel. Plaintiff is optimistic that a reasonable extension of time will allow her to finalize an engagement with a new attorney.

5. Lack of Prejudice to Defendant: Granting this extension will not prejudice the Defendant in any way. This matter is currently stayed pending Plaintiff's retention of new counsel. A brief extension to allow Plaintiff to secure representation will not cause undue delay but will instead serve the interests of justice by ensuring that the case may proceed on its merits with both parties being represented by counsel.

#### **COMPLIANCE WITH LOCAL RULE 5.3(b)**

Pursuant to Local Rule 5.3(b), Plaintiff communicated with counsel for Defendant DermaCare USA Corporation on November 21, 2025, to inquire as to their position on this motion. Counsel for Defendant stated they do not oppose the requested extension.

#### **CONCLUSION**

WHEREFORE, for the foregoing reasons, Plaintiff Nealy Skeldon respectfully requests that this Court grant her motion and enter an order extending the deadline for new counsel to file an appearance by forty-five (45) days, up to and including January 8, 2026.

Dated: November 21, 2025

Respectfully submitted,

/s/ Nealy Skeldon  
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**CERTIFICATE OF SERVICE**

I, Nealy Skeldon, hereby certify that on November 21, 2025, I caused a true and correct copy of the foregoing Plaintiff's Motion for Extension of Time to Obtain Counsel to be served upon counsel of record for the Defendant via the Court's CM/ECF electronic filing system.

/s/ Nealy Skeldon  
Nealy Skeldon